## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

KATIE FONDREN CARSON, as Administratrix of the Estate of Brian Christopher Ray, et al.

**PLAINTIFFS** 

v.

CAUSE NO. 3:23cv3063-HTW-LGI

RANKIN COUNTY, et al.

**DEFENDANTS** 

## RANKIN COUNTY'S MOTION FOR JUDGMENT ON THE PLEADINGS

**NOW COMES** Defendant Rankin County, Mississippi, and moves for judgment on the pleadings by stating as follows:

- 1. Plaintiffs have failed to allege a *Monell* claim against this Defendant.
- 2. Based on all legal precedent and analysis in its accompanying Memorandum of Authorities, Rankin County respectfully requests judgment in its favor.

**WHEREFORE, PREMISES CONSIDERED,** Rankin County prays that this Court grant its instant motion and dismiss all claims against it.

**RESPECTFULLY SUBMITTED**, this 10<sup>th</sup> day of May, 2024.

RANKIN COUNTY, MS - DEFENDANT

BY: /s/ Jason E. Dare

**IASON E. DARE** 

## **OF COUNSEL:**

Jason E. Dare (MSB No. 100973)
<a href="mailto:jdare@bislawyers.com">jdare@bislawyers.com</a>
BIGGS, INGRAM & SOLOP, PLLC
Post Office Box 14028
Jackson, Mississippi 39236-4028
Telephone: (601) 987-5307

Telephone: (601) 987-5307 Facsimile: (601) 987-5307